

FILED

## Clerk

District Court

Law Office of G. Anthony Long  
P. O. Box 504970, Second Floor Lim's Bldg.  
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AUG - 1 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

**Attorney for Defendant**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS**

UNITED STATES OF AMERICA ) CRIMINAL ACTION NO. 03-0001  
                                )  
Plaintiff                     )  
                                )  
v.                             )  
                                )  
VANN LE                     ) DEFENDANT'S AMENDED  
                                ) PROPOSED VOIR DIRE  
                                )  
Defendant                     )  
                                )

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## **PERSONAL**

1. How long have you lived on Saipan?
2. Are you a citizen of the U.S. or Trust Territory?
3. Have you or a member of your family or a close friend ever been the victim of a crime?
4. If so:

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- 1 A. Who was the victim?
- 2 B. What was the nature of the crime?
- 3 C. When did the crime occur?
- 4 D. Was the crime solved?
- 5 E. Was anyone charged with the crime?
- 6 F. Did the case go to court?
- 7 G. Did you testify?
- 8 H. What was the result of the trial?

- 12
- 13 5. Have you ever served on a jury before?
- 14 6. If so:
  - 16 A. Was it a criminal or civil case?
  - 17 B. What type of case was it?
  - 18 C. Did the jury reach a verdict?
  - 19 D. What was the verdict?
- 20 7. Are you presently under treatment by a doctor or taking any prescription
- 21 medicine?
- 22 8. If so:
  - 24 A. What is the treatment or medication?

- 1       B. Does it affect you alertness or ability to think clearly?
- 2
- 3       9. Do you have any off-island trips scheduled within the next 1 week?
- 4
- 5       10. This case will last about 1 week, is there any reason why you believe you
- 6
- 7           can not or should not serve as a juror in this case?

## EMPLOYMENT

- 9       1. Are you employed?
- 10
- 11       2. What is your position?
- 12
- 13       3. Who is your employer?
- 14
- 15       4. How long have you been employed with your employer?
- 16
- 17       5. Have you ever been employed with a law enforcement agency?
- 18
- 19       6. Who are your previous employers?
- 20
- 21       7. If this trial takes 1 week, will it cause you any job related problems to serve
- 22
- 23           as a juror?

## FAMILY

- 23       1. Are you married?
- 24
- 25       2. Who is your husband or wife?
- 26
- 27       3. Where is your husband or wife employed?

- 1       4. Has your husband or wife ever been employed with a law enforcement
- 2                          agency?
- 3       5. Do you have a common-law husband or wife?
- 4       6. If so, who is your common-law husband or wife?
- 5       7. Where is your common-law husband or wife employed?
- 6       8. Has your common-law wife or husband ever been employed with a law
- 7                          enforcement agency?
- 8       9. Do you have any children?
- 9       10. If so:
  - 10                          A. What are their ages?
  - 11                          B. Are any of your children living with you now?
  - 12                          C. Are any of your children employed?
  - 13                          D. If so:
    - 14                                  (i) Who is their employer?
    - 15                                  (ii) What is their position?
  - 16                          E. Have any of your children ever been employed with a law
  - 17                                  enforcement agency?
  - 18                          F. If so:
    - 19                                  (i) What agency?

(ii) When were they employed?

11. Are you related to or close friends with any person identified by the court as a possible witness?

12. If so:

(i) Identify the person or persons to whom you are

related?

(ii) What is the nature of your relationship to each

person identified?

(iii) How often do you see each person?

(iv) Do they live near you?

13. Do you have any relatives or close friends employed with the United States Attorney's Office or any other law enforcement agency?

14. If so,

(i) Please identify the individual?

(ii) Please state where the person works

(iii) What is their position?

(iv) What is the nature of your relationship to each person?

(v) How often do you see each person?

(vi) Do they live near you?

15. Are you related to or close friends with anyone who is currently being charged with a crime by the United States?
16. If so, who?
17. During the course of this trial will you discuss this case with your husband or wife, common-law husband or wife, children, relatives or friends?

## **PUBLICITY**

1. Do you read any local newspaper regularly?
2. Do you watch the local news on television regularly?
3. Do you tend to believe most of what you read in the local newspaper?
4. Do you tend to believe most of what you see or hear on the local television news?
5. Do you tend to believe most of what you hear on the news broadcast on local radio stations?
6. If you tend to believe most of the local news printed in the newspaper or broadcast on local television or radio please state why?
7. Have you heard of this case before?
8. If so:

- 1        A.     How did you hear about this case?
- 2        B.     What did you hear about this case?
- 3        C.     Do you believe what you heard?
- 4        D.     If you do not believe what you heard about the case please  
5                    explain why?
- 6
- 7        9.    Can you stop reading the newspaper for the duration of this trial ?
- 8
- 9        10.   Can you stop watching the local news on television for the duration  
10                    of this trial?
- 11
- 12        11.   Can you stop listening to the news on all local radio stations for the  
13                    duration of this trial?
- 14
- 15
- 16        **CASE SPECIFICS**
- 17
- 18        1.    Do you tend to believe a person is guilty because he is charged by the  
19                    United States with committing a crime?
- 20
- 21        2.    Do you tend to believe a person is guilty because he is on trial for  
22                    being charged with having committed a crime?
- 23
- 24        3.    Do you think the United States can charge an innocent person with a  
25                    crime?
- 26
- 27        4.    Do you believe a person is innocent if he is on trial for being charged
- 28

1           with having committed a crime?

2       5. Do you tend to believe that an agent of a federal agency is more  
3           truthful than other people?

4

5       6. Do you believe Mr. Le must present evidence showing he is not  
6           guilty?

7

8       7. If you believe that Mr. Le must present evidence showing he is not  
9           guilty, then please explain why you have that belief?

10

11      8. Would tend to believe Mr. Le is guilty if he does not present  
12           evidence?

13

14      9. Do believe Mr. Le must testify during this trial?

15

16      10. If you believe Mr. Le must testify during this trial, then please explain  
17           why?

18

19      11. Would you tend to believe that Mr. Le is guilty if he does not testify  
20           during the trial?

21

22      12. Have you served as a juror before in this court?

23

24      13. Do you think or believe a person is probably guilty of the crime  
25           charged because he knows or associated with other persons who have  
26           pled guilty to the crime?

27

28      14. Do you think or believe that people who enter into plea agreements

1 with the United States always tell the truth when they testify?

2 15. Are you related to anyone sitting in the jury box?

3 16. Have you truthfully answered all of these questions?

4  
5  
6 Dated this 1 st day of August, 2005.

7 Law Office of G. Anthony Long

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10 By:   
G. Anthony Long

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